

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

CRAIG BUCK, KENNETH MICCICHE,  
VALERIE L. PAWSON, CAROLINE  
MARSHALL-SMITH, WANDA MILLS; JEFF  
GOLUMBUK, ANESIA KALAITZIDIS,  
ATHANASE KARAGIORGOS; AND  
JENNIFER TSOUVRAKAS, on behalf of  
themselves and others,

*Plaintiffs,*

v.

ALASKA AIRLINES, AMERICAN  
AIRLINES, CONTINENTAL AIRLINES,  
DELTA AIR LINES, INC., NORTHWEST  
AIRLINES, SOUTHWEST AIRLINES CO.,  
d/b/a SOUTHWEST AIRLINES, CHINA  
EASTERN AIRLINES CORP. LTD, CHINA  
SOUTHERN AIRLINES CO. LTD., AER  
LINGUS LIMITED, ALITALIA-LINEE  
AEREE ITALINE S.p.A., D/B/A ALITALIA  
AIRLINES, BRITISH AIRWAYS, PLC, D/B/A  
BRITISH AIRWAYS, DEUTSCHE  
LUFTHANSA, A.G., D/B/A LUFTHANSA  
AIRLINES, OLYMPIC AIRWAYS-  
SERVICES, SA, D/B/A OLYMPIC  
AIRWAYS, AIR TRANSPORT  
ASSOCIATION OF AMERICA, INC.,  
AIRLINES REPORTING CORP., AND THE  
FEDERAL AVIATION ADMINISTRATION

*Defendants.*

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:  
: **CHINA SOUTHERN'S**  
: **MOTION TO DISMISS FOR**  
: **LACK OF PERSONAL**  
: **JURISDICTION**

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Defendant China Southern Airlines Company Limited (hereinafter "CHINA SOUTHERN"), hereby moves, pursuant to the requirements of Rule 12(b)(2) of the Federal Rules of Civil Procedure, to dismiss the claims asserted by the plaintiff on the grounds that the

Court lacks personal jurisdiction over CHINA SOUTHERN.

As grounds for its motion, CHINA SOUTHERN refers the Court to the Memorandum in Support of Motion to Dismiss for Lack of Personal Jurisdiction, as well as the Declaration of Aizhen Ye in support of CHINA SOUTHERN's Motion to Dismiss for Lack of Personal Jurisdiction which are filed herewith.

WHEREFORE, CHINA SOUTHERN respectfully requests that its motion be allowed.

**REQUEST FOR ORAL ARGUMENT**

Defendant CHINA SOUTHERN respectfully requests oral argument on its Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(2) in order to assist the Court in resolving the issues raised.

Dated: September 30, 2005

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